
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JJ Arch LLC

(List the full name(s) of the plaintiff(s)/petitioner(s).)

-against-

608941 NJ Inc; Jared Chassen; Arch Real Estate Holdings LLC; Infinity Real Estate LLC; and Michelle Miller

(List the full name(s) of the defendant(s)/respondent(s).)

24cv08649 (JAV)

CV 24-10381 () ()

Application for the Court to
Request Pro Bono Counsel

MEMO ENDORSED

I ask the Court to request a *pro bono* attorney to represent me in this action. In support of my application, I declare under penalty of perjury that the following information is true and correct:

1. Have you previously filed a “Request to Proceed in Forma Pauperis” (an IFP application)?

Please check the appropriate box below:



I have previously filed an IFP application in this case, and it is a true and correct representation of my current financial status.



I have not previously filed an IFP application in this case and now attach an original IFP application showing my financial status.



I have previously filed an IFP application in this case, but my financial status has changed. I have attached a new IFP application showing my current financial status.

2. Explain why you need an attorney in this case. (Please note that requests for *pro bono* counsel are rarely granted at the early stages of a case and usually not before the Court has issued a decision on the merits of the case.) If you asked for an attorney earlier in this case, please also explain what has changed since you last asked for an attorney.

This is one of several pleadings that occurred in conjunction with a bankruptcy filing. My letter to the Court on Jan 2, 2025 explains the situation. I have a contractual indemnity for this entity representation and defense insurance, neither are being honored at this time. During the midst of the Chapter 11 bankruptcy (JPM in 2024), the attorneys disbanded due to payment when the insurance company changed course after promises to pay. The lack of funding, does not allow for funding for counsel with the myriad of cases. The remand of NYS Court includes now a criminal contempt charge that asks for my principal filing of a bankruptcy to result in incarceration. NYS Court has allowed motion practice on this without the appearance of an attorney on my behalf or for the entity.

3. Explain what steps you have taken to find an attorney and with what results. (Please identify the lawyers, law firms or legal clinics you have contacted and their responses to your requests. If you have limited access to the telephone, mail, or other communication methods, or if you otherwise have had difficulty contacting attorneys, please explain.)

My 1.02.25 letter to SDNY explains it but the firms that i worked with for years are in conflict. The fact that i had to represent myself Pro Se in NYS, excludes many firms. Since then i have contacted countless firms for help and since my indemnity and insurance are not being honored, any firm capable wants \$250,000 up front that the LLC does not have, and i do not have the liquidity personally. My civil rights have been violated but there is no path to pursue .

4. If you need an attorney who speaks a language other than English, state what language(s) you speak: _____.
5. I understand that if an attorney volunteers to represent me and that attorney learns that I can afford to pay for an attorney, the attorney may give this information to the Court.
6. I understand that even if the Court grants this application, I will receive *pro bono* counsel only if an attorney volunteers to take my case and that there is no guarantee that an attorney will volunteer to represent me.
7. I understand that if my answers on this application or in my IFP application are false, my case may be dismissed.

January 11, 2025

Date

Simpson, Jeffrey, S

Name (Last, First, MI)

1055 Park Ave

Address

646-753-2872

Telephone Number

Jeffrey Simpson

Signature

Prison Identification # (if incarcerated)

NY

City

NY

State

10028

Zip Code

jsimpson001@icloud.com

E-mail Address (if available)

The Application to Request Pro Bono Counsel for debtor JJ Arch LLC, a corporate entity, is DENIED.

Per this Court's Order on January 3, 2025 (ECF No. 17), the February 14, 2025 deadline for JJ Arch LLC to obtain counsel remains in effect. The Clerk of Court is respectfully directed to terminate ECF No. 18.

SO ORDERED.

Date: 1/14/2025


HON. JEANNETTE A. VARGAS
UNITED STATES DISTRICT JUDGE